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August 15, 2014

VIA HAND DELIVERY

The Honorable Thomas P. Griesa
United States District Judge for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: United States v. Prevezon Holdings Ltd., et al., 13 Civ. 6326 (TPG)

Dear Judge Griesa:

I write as counsel for non-parties William Browder (“Browder”), Sundance Aspen, LLC, Michael Cassidy Foley, and Acme Property Management, Inc. (collectively, the “Affected Third Parties”), concerning subpoenas recently issued by the Defendants in this civil forfeiture action.

On July 29, 30, and 31, 2014, Defendants issued subpoenas to each of the Affected Third Parties in Aspen, Colorado (the “Subpoenas”). The subpoena to Mr. Browder calls for him to testify and produce documents in Aspen on August 15, 2014; the remaining subpoenas call for the other Affected Third Parties (which all have a connection in some way to Mr. Browder) to produce documents there that same day.

Consistent with Your Honor’s authority to control discovery in this matter and the recent transfer to this Court of pending motions to quash two other subpoenas also issued by the Defendants to target Mr. Browder, the parties here have agreed to the enclosed Stipulation and Proposed Order to ensure that any and all motions with respect to these new Subpoenas will be heard and decided by this Court. The stipulation also contains a one-week extension of the Affected Third Parties’ time to object, move, or otherwise respond to these four Subpoenas, and a further extension of one additional week for the Government to file its own motion. This limited extension was all that Defendants would give, despite the fact that we were only first retained last week.

We understand that there is no Rule 26 discovery plan in this case, that Defendants have refused to sign a protective order governing discovery, and that Defendants have thus far not produced any discovery of their own. Notwithstanding the lack of party discovery, the pending motions concerning other subpoenas targeting Mr. Browder, and the fact that our

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firm was only just recently retained to represent the Affected Third Parties, Defendants have refused to grant any further extension. Defendants' stated reason for refusing our request is that, because our negotiations failed to produce a longer extension, they are "not in a position to grant further extensions" beyond a single week. We therefore respectfully request from this Court an extension until September 12, 2014, to object, move, or otherwise respond to these Subpoenas. The Affected Third Parties have made no prior requests for such an extension or adjournment, and we do so, without waiving any defenses, including jurisdictional defenses, relating to Defendants' issuance of these Subpoenas. The Government consents to the Affected Third Parties' extension request, provided it has one additional week -- until September 19, 2014 -- to file its own motion papers.

As always, we appreciate Your Honor's consideration of the enclosed Stipulation and Proposed Order and the Affected Third Parties' request to extend their time to object, move or otherwise respond to these new Subpoenas to and including September 12, 2014.

Respectfully,

A handwritten signature in blue ink, appearing to read "Randy M. Mastro / LHR".

Randy M. Mastro

cc: Seth T. Taube, Esq.
Paul Monteleoni, Esq.